



Debevoise & Plimpton LLP
919 Third Avenue
New York, NY 10022
+1 212 909 6000

May 31, 2022

Via ECF

The Honorable Gabriel W. Gorenstein
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Schansman et al. v. Sberbank of Russia PJSC, et al.*, 1:19-cv-02985 (ALC) (GWG)
Consented Letter Motion for Extension of Time to Respond to Plaintiffs' Request
for Formal Briefing of Proposed Motion to Compel the Production of Documents
from Defendant Sberbank of Russia

Dear Judge Gorenstein:

On behalf of Defendant Sberbank of Russia ("Sberbank"), and pursuant to Your Honor's Individual Practices Rule 1.E, we submit this letter motion to request that the Court exercise its authority under Federal Rule of Civil Procedure 6(b)(1)(A) to extend by two days the deadline for Sberbank's response to Plaintiffs' Request for Formal Briefing of Proposed Motion to Compel the Production of Documents from Defendant Sberbank of Russia, ECF No. 336.

On May 26, 2022, this Court ordered Sberbank to respond to Plaintiffs' Request for Formal Briefing "by May 31, 2022, without prejudice to any extension request compliant with Paragraph 1.E of the Court's Individual Practices." Order, ECF No. 337. Sberbank has identified replacement counsel and is working to finalize their engagement, including payment of a retainer. As announced earlier today, however, a new round of European Union sanctions will remove Sberbank from the SWIFT messaging system.¹ A short extension is required to enable counsel to consult with Sberbank and assess the effect of this development on the anticipated timing of the appearance of new counsel for Sberbank in this case.

Sberbank has not previously requested an extension of the time to respond to Plaintiffs' Request for Formal Briefing, and granting the extension would not affect any other scheduled dates in this action. Plaintiffs' counsel confirmed by email today that they do not oppose the

¹ See "Opening remarks by President von der Leyen at the joint press conference with President Michel following the special meeting of the European Council of 30 May 2022," Brussels, May 31, 2022, available at https://ec.europa.eu/commission/presscorner/detail/en/statement_22_3382.

requested extension. Sberbank therefore respectfully requests that the Court order an extension of the deadline to respond to Plaintiffs' Request for Formal Briefing to June 2, 2022.

Respectfully submitted,

DEBEVOISE & PLIMPTON LLP

WHITE & CASE

/s/ William H. Taft V

/s/ Nicole Erb

Mark P. Goodman
William H. Taft V
919 Third Avenue
New York, New York 10022
Telephone: + 1 212 909 6000
mpgoodman@debevoise.com
whtaft@debevoise.com

Nicole Erb
Claire A. DeLelle
701 Thirteenth Street, NW
Washington, DC 20005
Telephone : + 1 202 626 3600
nerb@whitecase.com
cdelelle@whitecase.com

Counsel for Sberbank of Russia

cc: All counsel of record (via ECF)